

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:** :  
 : **Chapter 11**  
**DELPHI CORPORATION, et al.** :  
 :  
**Debtors.** : **Case No. 05-44481 (RDD)**  
 : **(Jointly Administered)**  
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**NOTICE OF RECLAMATION DEMAND OF PRIMUS METALS, INC.**

**PLEASE TAKE NOTICE** that Primus Metals, Inc. served a written reclamation demand on Debtor Delphi Medical Systems Colorado Corporation on October 11, 2005 (the "PMI Demand"). A true and correct copy of the PMI Demand (together with Debtor's written acknowledgement of receipt and a summary of unpaid prepetition invoices) is attached hereto as Exhibit A and incorporated herein by this reference. Copies of all unpaid prepetition invoices (with specific descriptions of relevant goods) have been included with the copies of this Notice served on Debtor and Debtor's counsel and are available from undersigned counsel upon request.

Dated October 13, 2005.

Respectfully submitted,

BLOCK MARKUS & WILLIAMS LLC



Thomas H. Keyse, Esq. (CO # 17869)  
1700 Lincoln Street, Suite 4000  
Denver, Colorado 80203  
(303) 830-0800  
(303) 830-0800 telecopier  
[tkeyse@bmwllc.com](mailto:tkeyse@bmwllc.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of October, 2005, I caused a true and correct copy of the foregoing **NOTICE OF RECLAMATION DEMAND OF PRIMUS METALS, INC.**, together with copies of all unpaid pre-petition invoices related to the Notice, to be placed into the United States mail, first class postage prepaid and correctly addressed as follows:

Delphi Medical Systems  
4300 Road 18  
Longmont, CO 80504  
Attn: Grace Mills and Dave Berge

John Wm. Butler, Jr.  
Skadden, Arps, Slate, Meagher & Flom LLP  
333 West Wacker Drive, Suite 2100  
Chicago, IL 60606

Kayalyn A. Marafioti  
Skadden, Arps, Slate, Meagher & Flom LLP  
Four Times Square  
New York, NY 10036



## **EXHIBIT A**

938 Quail Street Unit E  
Lakewood CO 80215  
(303) 235-8944  
Fax: (303) 235-8947



October 11, 2005

VIA FAXSIMILE

Delphi Medical Systems  
4300 Road 18  
Longmont, CO 80504  
Attention: Grace Mills  
Dave Berge

Re: **Reclamation Demand**

Dear Grace and Dave:

As you are aware, Primus Metals, Inc. has sold and delivered to Delphi Medical Systems ("DMS"), in the ordinary course of our business, numerous machined metal and plastic components for medical products (the "Goods"). As you also are aware, DMS did not make payment for many of these Goods, including Goods it received over the last ten days, prior to filing for Chapter 11 bankruptcy protection on October 8, 2005. It is now our belief that DMS received these Goods (a specific list will be provided to you shortly) on credit while DMS was insolvent and therefore we are demanding, pursuant to Section 2-702 of the Uniform Commercial Code and Section 546(c) of the United States Bankruptcy Code, that you make these Goods, wherever they may be located, immediately available to us. You are now on notice that in light of this demand, DMS has no legal right to dispose of these Goods by sale or otherwise or to change their character in any way. Please contact us immediately so that we may arrange to reclaim these Goods.

Sincerely,

Primus Metals, Inc.

By:   
Randall E. Brodsky, President

**DELPHI**

Medical Systems

Date 10/12/05 Pages 1 Including Cover

To RANDALL BRODSKY

Phone \_\_\_\_\_ Fax 3235-8947

From DAVE BERGE Extension 250

**Message**

Randy -

I RECEIVED YOUR RECLAMATION DEMAND  
AND HAVE FORWARDED ON TO OUR  
CORPORATE TEAM FOR PROCESSING. I  
WILL ADVISE YOU AS SOON AS I HEAR  
ANYTHING.

DBerge

Corporate and individual users of this system are advised that it is the responsibility of the individual or corporate user to ensure that the use of this system complies with all applicable laws, rules, regulations and ethical standards of the user's jurisdiction. The use of this system for any illegal or unethical purpose is prohibited. The use of this system for any illegal or unethical purpose is prohibited.

10:23 AM

10/11/05

## PRIMUS METALS, INC.

## A/R Aging Detail

As of October 11, 2005

Date	Num	P. O. #	Name	Due Date	Aging	Open Balance
<b>Current</b>						
9/14/2005	13814	701577	DELPHI MEDICAL ...	10/14/2005		187.00
9/14/2005	13815	701577	DELPHI MEDICAL ...	10/14/2005		168.00
9/14/2005	13816	704683	DELPHI MEDICAL ...	10/14/2005		9,558.83
9/14/2005	13817	700668	DELPHI MEDICAL ...	10/14/2005		1,538.75
9/14/2005	13818	702865	DELPHI MEDICAL ...	10/14/2005		3,569.15
9/15/2005	13823	704198	DELPHI MEDICAL ...	10/15/2005		3,577.79
9/16/2005	13830	798015	DELPHI MEDICAL ...	10/16/2005		127.80
9/16/2005	13831	703997	DELPHI MEDICAL ...	10/16/2005		11,628.11
9/16/2005	13839	706435	DELPHI MEDICAL ...	10/16/2005		103.07
9/16/2005	13840	702865	DELPHI MEDICAL ...	10/16/2005		2,325.53
9/16/2005	13841	704235	DELPHI MEDICAL ...	10/16/2005		5,876.73
9/16/2005	13842	780544	DELPHI MEDICAL ...	10/16/2005		75.90
9/19/2005	13848	704199	DELPHI MEDICAL ...	10/19/2005		4,276.19
9/19/2005	13849	703997	DELPHI MEDICAL ...	10/19/2005		8,362.19
9/20/2005	13859	704198	DELPHI MEDICAL ...	10/20/2005		11,465.39
9/20/2005	13861	706503	DELPHI MEDICAL ...	10/20/2005		1,995.95
9/20/2005	13862	705228	DELPHI MEDICAL ...	10/20/2005		1,708.95
9/21/2005	13866	700668	DELPHI MEDICAL ...	10/21/2005		3,328.49
9/21/2005	13867	703241	DELPHI MEDICAL ...	10/21/2005		2,272.08
9/22/2005	13881	705228	DELPHI MEDICAL ...	10/22/2005		9,805.95
9/22/2005	13882	705234	DELPHI MEDICAL ...	10/22/2005		2,314.25
9/23/2005	13886	704683	DELPHI MEDICAL ...	10/23/2005		3,799.33
9/23/2005	13887	704198	DELPHI MEDICAL ...	10/23/2005		2,809.55
9/23/2005	13893	704236	DELPHI MEDICAL ...	10/23/2005		1,512.68
9/23/2005	13896	704299	DELPHI MEDICAL ...	10/23/2005		46.20
9/26/2005	13902	703973	DELPHI MEDICAL ...	10/26/2005		1,224.65
9/26/2005	13903	705036	DELPHI MEDICAL ...	10/26/2005		10,882.08
9/27/2005	13914	707114	DELPHI MEDICAL ...	10/27/2005		429.95
9/27/2005	13915	704198	DELPHI MEDICAL ...	10/27/2005		2,809.55
9/27/2005	13916	704236	DELPHI MEDICAL ...	10/27/2005		1,427.78
9/27/2005	13917	704199	DELPHI MEDICAL ...	10/27/2005		1,412.75
9/28/2005	13919	704200	DELPHI MEDICAL ...	10/28/2005		2,788.05
9/28/2005	13920	704199	DELPHI MEDICAL ...	10/28/2005		1,412.75
9/28/2005	13921	703997	DELPHI MEDICAL ...	10/28/2005		7,031.63
9/28/2005	13922	704235	DELPHI MEDICAL ...	10/28/2005		2,263.35
9/28/2005	13923	707114	DELPHI MEDICAL ...	10/28/2005		447.95
9/29/2005	13932	705036	DELPHI MEDICAL ...	10/29/2005		10,527.05
9/29/2005	13933	705386	DELPHI MEDICAL ...	10/29/2005		658.55
9/29/2005	13934	704199	DELPHI MEDICAL ...	10/29/2005		1,412.75
9/29/2005	13935	703973	DELPHI MEDICAL ...	10/29/2005		1,608.59
9/29/2005	13936	704198	DELPHI MEDICAL ...	10/29/2005		2,761.95
9/29/2005	13937	706435	DELPHI MEDICAL ...	10/29/2005		923.15
9/30/2005	13939	VARIOUS	DELPHI MEDICAL ...	10/30/2005		3,271.84
9/30/2005	13940	VARIOUS	DELPHI MEDICAL ...	10/30/2005		5,988.80
9/30/2005	13946	704198	DELPHI MEDICAL ...	10/30/2005		3,025.55
9/30/2005	13947	704683	DELPHI MEDICAL ...	10/30/2005		783.83
9/30/2005	13948	703997	DELPHI MEDICAL ...	10/30/2005		15,982.67
9/30/2005	13949	704236	DELPHI MEDICAL ...	10/30/2005		1,696.70
9/30/2005	13950	701745	DELPHI MEDICAL ...	10/30/2005		1,359.95
9/30/2005	13951	703788	DELPHI MEDICAL ...	10/30/2005		75.00
9/30/2005	13952	703997	DELPHI MEDICAL ...	10/30/2005		378.83
9/30/2005	13953	791286	DELPHI MEDICAL ...	10/30/2005		119.40
10/4/2005	13962	707304	DELPHI MEDICAL ...	11/3/2005		462.95
10/4/2005	13963	702865	DELPHI MEDICAL ...	11/3/2005		2,506.70
10/4/2005	13964	704200	DELPHI MEDICAL ...	11/3/2005		2,283.95
10/4/2005	13966	790870	DELPHI MEDICAL ...	11/3/2005		45.60
10/4/2005	13967	704658	DELPHI MEDICAL ...	11/3/2005		951.50
10/4/2005	13968	704235	DELPHI MEDICAL ...	11/3/2005		1,599.50
10/4/2005	13969	704683	DELPHI MEDICAL ...	11/3/2005		2,468.63
10/4/2005	13970	704236	DELPHI MEDICAL ...	11/3/2005		2,133.70
10/4/2005	13971	707396	DELPHI MEDICAL ...	11/3/2005		523.99
10/4/2005	13972	706435	DELPHI MEDICAL ...	11/3/2005		1,376.75
10/5/2005	13975	707158	DELPHI MEDICAL ...	11/4/2005		473.95
10/5/2005	13976	704582	DELPHI MEDICAL ...	11/4/2005		483.95
10/7/2005	14002	704198	DELPHI MEDICAL ...	11/6/2005		5,221.55
10/7/2005	14003	704236	DELPHI MEDICAL ...	11/6/2005		2,537.08

## PRIMUS METALS, INC.

## A/R Aging Detail

As of October 11, 2005

Date	Num	P. O. #	Name	Due Date	Aging	Open Balance
10/7/2005	14004	704235	DELPHI MEDICAL ...	11/6/2005		2,725.58
10/7/2005	14007	707158	DELPHI MEDICAL ...	11/6/2005		205.95
10/10/2005	14012	704582	DELPHI MEDICAL ...	11/9/2005		1,887.95
						203,028.24

Total Current

1 - 30

Total 1 - 30

31 - 60

Total 31 - 60

61 - 90

Total 61 - 90

&gt; 90

Total &gt; 90